

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | Criminal No. 04-10384-PBS |
| v. |) | |
| |) | |
| DANIEL KAMEN, |) | |
| Defendant. |) | |
| |) | |

GOVERNMENT'S MOTION TO RE-SCHEDULE HEARING
TO A DATE EITHER BEFORE APRIL 27, 2006 OR AFTER MAY 13, 2006

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, hereby respectfully requests that the Suppression Hearing, scheduled this day for April 28, 2006, be re-scheduled for a date either prior to April 27 or after May 13, 2006 (the undersigned has a trial before J. Young which begins on April 18, but am otherwise fully available).

The reason for this request is that the undersigned has a long-planned overseas travel schedule (surrounding a birthday of unfortunate significance) during the period beginning on April 27 and lasting through May 13, 2006.

The government will attempt to expedite its written response to the Motion received on March 17 and would note for the Court that it has, repeatedly and without hesitation, agreed to multiple requests by the Defendant's counsel that time be extended for various purposes, including the date when the current Motion was due.

In addition, I think it is fair to represent that the factual matter to be examined by the Court at this hearing is not, relatively speaking, a complicated one which could not be presented to the Court in an expedited fashion if necessary.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

March 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys for defendant DANIEL KAMEN, on March 20, 2006, via electronic notification.

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

March 20, 2006